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November 13, 2019

Honorable Lee H. Rosenthal Chief United States District Judge United States District Courts 515 Rusk St. Houston, Texas 77002

Re: Civil Action No. 17-cv-2316; *Nations Equipment Finance, LLC, et al. vs. Kosta Leontaritis, et al.*; In the United States District Court, Southern District of Texas, Houston Division.

## Dear Judge Rosenthal:

This firm represents Defendants Kosta Leontaritis, Sophia Pettas Leontaritis, Asphwax, Inc., Kosta Oil Field Technologies, Inc. d/b/a Kosta Tech, and Zante Enterprises, Inc. ("Defendants") in this case. Before sending this letter, I conferred with counsel for the Plaintiff, Afton Sands.

The parties have continued to confer and work informally and jointly on discovery and documents reflecting ability (or inability) of Defendants to pay. Mrs. Sands will go on maternity leave and be unavailable after Thursday, November 21, 2019 (and potentially earlier). We would respectfully request the Court schedule a short status conference call (no more than 15 minutes) with counsel to discuss deadlines and scheduling before Mrs. Sands becomes unavailable. If the Court would entertain a call, counsel are <u>not</u> available between 10:30-2:00 on November 14, 2019, 10-11 on November 19, 2019, 12-4 on November 20, 2019, and 8-1 on November 21, 2019.

We realize the short notice for this request, and if the Court would entertain a short call, but cannot do so this next week, we will again seek the Court's indulgence approximately 30 days after Mrs. Sands' baby is born. Thank you.

Very truly yours,

/s/D. Scott Funk

D. Scott Funk

CC: Afton Sands (via e-mail)